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| UNITED STATES OF AMERICA | * | CRIMINAL NO. | 09-266 |
| v. | * | SECTION: | "L" |
| DONELLE HUMPHREY | * | | |
| | * | * | * |

Were this matter brought to trial the United States would prove, through competent witnesses and documentary evidence, the following beyond a reasonable doubt.

On or about October 9, 2006, in the Eastern District of Louisiana, defendant **DONELLE HUMPHREY (HUMPHREY)** filed an application for disaster assistance with the Louisiana Road Home Program (LRHP). The LRHP is funded by the United States Department of Housing and Urban Development (HUD), an agency of the United States, through HUD's Community Development Block Grant (CDBG) Disaster Recovery Assistance Program.

In her application, **HUMPHREY** falsely claimed that on August 29, 2005, the day Katrina struck, her primary residence was 1412 Deslonde Street, New Orleans, Louisiana. In fact, **HUMPHREY** resided in the State of Georgia, and therefore, was ineligible for disaster assistance.

Due to the material false statements concerning residency contained in her LRHP application, **HUMPHREY** received \$22,320.93 in federal disaster assistance to which she was not entitled. **HUMPHREY** made the material false statements to LRHP knowing the statements were false, and for the purpose of misleading LRHP.

After being advised of her constitutional rights, **HUMPHREY** admitted the foregoing facts to agents of the United States Department of Housing and Urban Development, Office of the Inspector General.

DONELLE HUMPHREY
Defendant

DATE

ARTHUR A. LEMANN, IV ESQ.
Counsel for Donelle Humphrey

DATE

IRENE GONZÁLEZ
Assistant United States Attorney

DATE